UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 14 2011

REPLY TO THE ATTENTION OF: LR-8J

Andrew Barker, General Manager
CMA Recycling
415 East 151st Street
East Chicago, Indiana 46312

Re: Compliance Evaluation Inspection
EPA I.D. No.: IND005443825 (Meretec Corp inactive)

Dear Mr. Barker:

On December 21, 2010, a representative of the U.S. Environmental Protection Agency inspected CMA Recycling located in East Chicago, Indiana (site). The purpose of the inspection was to evaluate CMA Recycling's compliance with hazardous waste requirements of the Resource Conservation and Recovery Act, as amended (RCRA). Enclosed please find a copy of our inspection report.

Our inspection did not detect violations of the specific RCRA requirements evaluated, as described in the report. Please note that this evaluation is based on observations made by, and information disclosed to, EPA during the inspection. This letter does not relieve CMA Recycling of its obligation to comply with RCRA and other environmental regulations and statutes. We may inspect CMA Recycling in the future to ensure compliance as part of federal or state environmental inspection programs.

If you have any questions or concerns regarding this matter, please contact Ms. Sue Brauer, of my staff, at (312) 353-6134.

Sincerely,

Mary S. Setnicar, Acting Chief
RCRA Branch
Land and Chemicals Division

Enclosure

cc: Ms. Nancy Johnston, Environmental Manager, IDEM

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA Branch, LR-8J
77 W. JACKSON BLVD.
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME:	CMA Recycling (formerly known as Meretec)
EPA ID NUMBERS:	IND005443825 (inactive) MERETEC CORP IND094761855 (inactive) MRI CORP IND980905996 (ACTIVE) CUMMINGS CHEM CO INC INR000004267 (inactive) HOWARD INDUSTRIES INC
ADDRESS:	415 East 151st Street, East Chicago, Indiana 46312
DATE OF INSPECTION:	December 21, 2010
EPA INSPECTOR:	Sue Rodenbeck Brauer, Environmental Scientist

PREPARED BY: Sue Rodenbeck Brauer 01/21/2011
Date

ACCEPTED BY: Paul Little 1-24-11
Paul Little, Chief, CS# 2 Date

Purpose of Inspection

This inspection was an evaluation of CMA Recycling's compliance with hazardous waste regulations found at (Indiana Administrative Code, Title 329 Solid Waste Management Board, Article 3.1 Hazardous Waste Management Permit Program and Related Hazardous Waste Management, 329 IAC 3.1) and Title 40 of the Code of Federal Regulations (CFR). I performed the inspection alone because the IDEM inspector was not available. The inspection was a Federal lead RCRA Compliance Evaluation Inspection (CEI).

Participants

Sue Rodenbeck Brauer, Environmental Scientist
EPA Region 5, Land and Chemicals Division, RCRA Branch, Compliance Section 2

Site Representatives:
Andrew Barker, General Manager and Doug Bushnell, Operations Manager
andrew.barker@cmacorp.net doug.bushnell@cmacorp.net
CMA Recycling, 415 E. 151 Street, East Chicago, Indiana 46312
Telephone (219) 391-7075, Facsimile (219) 391-7085, www.cmacorp.net

Introduction

I arrived at the site shortly after 10:30 AM. The office and customer entrance gate had not been plowed to clear accumulated snow, so I entered at the truck gate and parked next to the few vehicles present behind the building. I rang the back door buzzer and was admitted by one of two office staff. I introduced myself, presented my inspector credentials and identification, and asked for the environmental manager. I was told that Andy was not available due to a conference call and heard that Doug had left to pick up a trailer. I left for half an hour and returned at 11:10 AM; there were no new vehicle tracks in the snow. I was directed to a reception area at the front of the building and waited until 11:15 AM when a pick-up truck pulled into the facility lot pulling a trailer. Shortly thereafter, Doug Bushnell, Operations Manager, and Andrew Barker, General Manager greeted me, and we walked to a conference room on the second floor. I described the purpose of the inspection and the process by which I intended to conduct the inspection. Mr. Barker and Mr. Bushnell provided their business cards. Mr. Barker explained that he is the finance guy and Mr. Bushnell is, as indicated by his hard hat label, "the man." Mr. Bushnell has been associated with the dezinc operation from the beginning (as Meretec). CMA Recycling historically had about 20 employees at this location. In July 2010, there were sixteen employees. As of December 21, CMA Recycling had eight employees in East Chicago. CMA is a subsidiary of an Australian corporation. The building had obviously been recently remodeled (see photos in Appendix A). The interior decorating was not worn. Mr. Barker explained that the decision to renovate the 1925 and 1941 buildings was made in February 2008 when the economic outlook was good. Mr. Barker provided a verbal description of the facility's former activities and current activities. Both Mr. Barker and Mr. Bushnell were present during the office discussion, lab tour, and operations tour.

I provided Small Business Resources and Pollution Prevention information sheets to Mr. Barker, who slid them down the conference table to Mr. Bushnell.

Site Description

Unless otherwise specified, the information in this Site Description section was provided by Mr. Barker. This CMA Recycling facility removed zinc from select scrap metal. CMA Recycling now trades high grade ferrous steel scrap (*not* including automotive scrap). The only scrap metal onsite consisted of reject steel coils that had, for example, a marred surface and therefore were not useable by a manufacturer. CMA Recycling only accepts clean scrap—never dripping—via big dump trucks (tractor/trailers about 39 feet long).

Picture 015 in Appendix A is a site plan map. There is not barge access to the site via the Calumet River to the south and Indiana Harbor Canal to the west. Some transportation was previously conducted by rail, and there is a rail spur between the two operations buildings. Now most metal is transported by truck. CMA Recycling does some of its own transporting of goods. The operation is down to one driver and one truck. CMA Recycling vehicles have been routinely serviced offsite at "Truck City."

There is an on-site laboratory to test the steel substrate in order to determine whether the scrap composition meets foundry specifications. In particular, foundries are concerned with the amount of Magnesium, Boron, and Titanium present. Ductile iron foundries are the primary customer for clean black steel. An "arc-spark" device is used to determine chemical composition. Other lab tests are performed on the zinc particulate product.

CMA Recycling submitted a notice of intent to the Indiana Department of Environmental Management for the National Pollution Discharge Elimination System. Arcadis is the environmental consultant used by CMA Recycling for preparation of its stormwater plan.

Site Tour

We toured the laboratory in the office building first. I took photographs of zinc granules in plastic bottles in a hood, scrap metal on the central lab bench, and, on walls to the left and right of the door, laboratory reagents on shelves. According to Mr. Barker, rust is a good sign in CMA's business. Starting from the door nearest the receptionist's work area, a laboratory hood was installed over a lab work surface and an open counter top extended toward the windows to the west. There were three shelves on the south wall. Hydrated lime, rotary, chemical grade calcium hydroxide was on the top shelf. Rather than inventory the reagents during the inspection, I took photographs which did not capture all of the label names. Chemical reagents on the second laboratory shelves from the top included: potassium chloride; magnesium sulfate 7 hydrate, crystal; sodium hydroxide; two bottles with labels not visible; zinc; diatomaceous earth; disodium ethylene diamine tetra. . . ; erlochrome black T; Tris(hydroxyl . .) aminomethane; petroleum jelly; heavy . . . sili . . . aerosol (flammable); and, Elmer's Slide-All. Chemical reagents on the third shelf from the top included: a short, narrow, illegible bottle, barium chloride dihydrate; barium hydroxide, B-hydrate, crystal; barium nitrate (small and large bottles); calcium chloride dehydrate; . . . fluoride; . . . ate, crystal; sodium nitrate; calcium carbonate; Morton table salt (NaCl); pH (buffer?); dry neutralizer for bases; and, desiccants. A central lab bench appeared to be set up for titrations. On the north wall is a second door near the

window. Above the countertop (with refrigerator and microwave) on the right wall were more shelves with supplies. Cardboard boxes were on the top shelves. The next shelf down to the left held retain samples of zinc, pump oil, and other bottles. The shelf behind the microwave held primarily sodium hydroxide. Next to the shelf with retain samples and pump oil were packaging supplies. The shelf above the balance and pH meter held phosphoric acid, methyl orange indicator, . . . green indicator; and pH buffers. The shelf above the UIC Inc. Coulometrics acidification module (for inorganic carbon determination) held bottles labeled "Fresh . . ." dated 6/22/07, diluted hydrochloric acid, 45% potassium hydroxide, 4N perchloric acid, and prepared calcium chloride solution. Plastic carboys of "waste acid" (actually used acid to be re-used for cleaning glassware, according to Mr. Bushnell) were placed in and next to the lab sink.

Mr. Barker described the operations in the electrowinning (EW) Building. We proceeded from the office building to the EW Building where the zinc was taken out of solution by a plating process in eight elevated cells. The details of the process are proprietary. Product zinc is managed in one metric ton super sacks. I saw a small quantity of lab chemicals used for titrations in the EW Building control room.

We crossed over the railroad track to the winterized (no heat) Dezinc Building, and Mr. Barker described the operations there. It contains a boiler, more than five vertical tanks, and sluicing equipment. There may be a boiler stack visible from certain vantage points outside the building. Shredding the metal increases the surface area to the extent that heated chemical solutions dissolve the zinc. No hazardous waste is generated. Some residual carbonate material has been determined to be nonhazardous.

We exited from the Dezincing Building to look around in the yard. I took photos of the scrap metal rolls, waste piles, and the shredder and conveying equipment.

Record Review

Back in the office conference room, I asked for documentation of the last waste shipped offsite. I took a photograph of a shipping ticket for used oil removed by Future Environmental on 7/12/06. I didn't review waste profiles/characterizations, waste analysis records, manifests, land disposal restriction notifications (LDR), weekly container inspection logs, daily tank inspection logs, and the contingency plan because Mr. Barker stated that no hazardous waste is generated, and I presumed that was true for the past three years. I completed a U.S. EPA Generator Checklist for Indiana following the record review. See Attachment B.

No concerns were raised during review of the used oil shipping ticket, in part because used oil generators are not required to maintain records of shipment.

Closing Conference

During the laboratory portion of the site tour, I stated that some of the reagent chemicals (like acids and bases) would be hazardous waste when CMA Recycling decided to dispose of them and if laboratory operations were not resumed. I mentioned state waste exchanges as a possible way to manage the reagents. I left the site about 1:00 PM.

Attachments
A. Photographs
B. Checklist

ATTACHMENT A

Photographs

Picture 001.jpg, Tuesday, 12/21/10, 10:38:06 AM
Approaching CMA Recycling from the east on East 151 Street. The office building is red brick with curtain walls added to the rear and bridging two existing buildings. Employee parking is behind the office building. The two tan operations buildings farther from 151 Street and to the left in this photo are separated by railroad track. The aqua colored building west of the office building is not part of CMA Recycling.

Site Name: CMA Recycling (formerly Meretec)
EPA ID Number: IND005443825
Address: 415 East 151 Street, East Chicago, Indiana 46312
Photographer: Sue Rodenbeck Brauer
Camera: Canon PowerShot SD790 IS Digital Elph

Picture 002.jpg, Tuesday, 12/21/10, 10:38:58 AM.
Only the truck scale gate was open. The office and customer gate was closed. Neither entrance had been plowed. On the vertical entrance sign, "Cash 4 Scrap" had been marked-through. The building looked dark.

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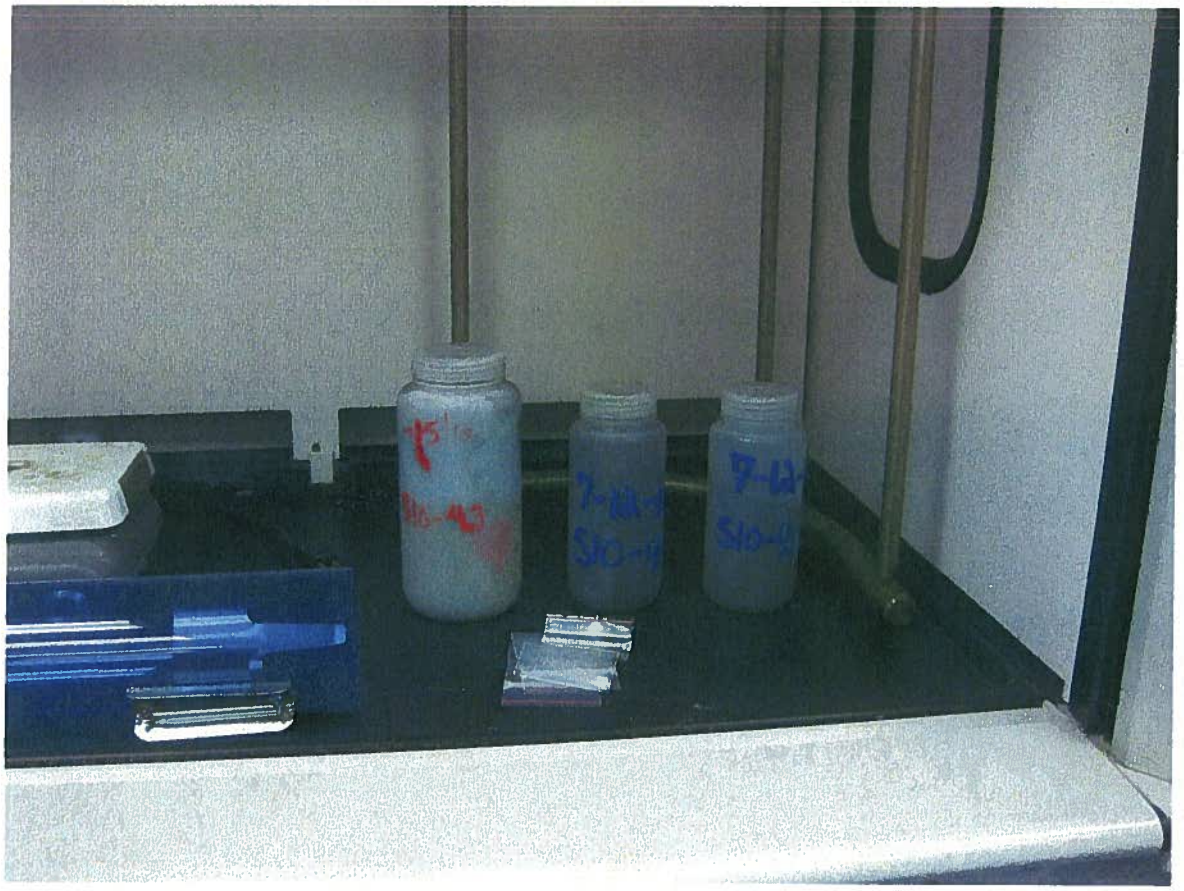

Picture 003.jpg, Tuesday, 12/21/2010, 11:41:23 AM
Lab bench with hood on south wall of lab. The bottles are dated July 2010 and contain metal particles. Empty plastic zip lock bags are in front of the plastic bottles.

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Picture 004.jpg, Tuesday, 12/21/2010, 11:45:27 AM.
This is an example of "good scrap" for CMA Recycling's business on the central lab bench. The rust indicates the preferred composition.

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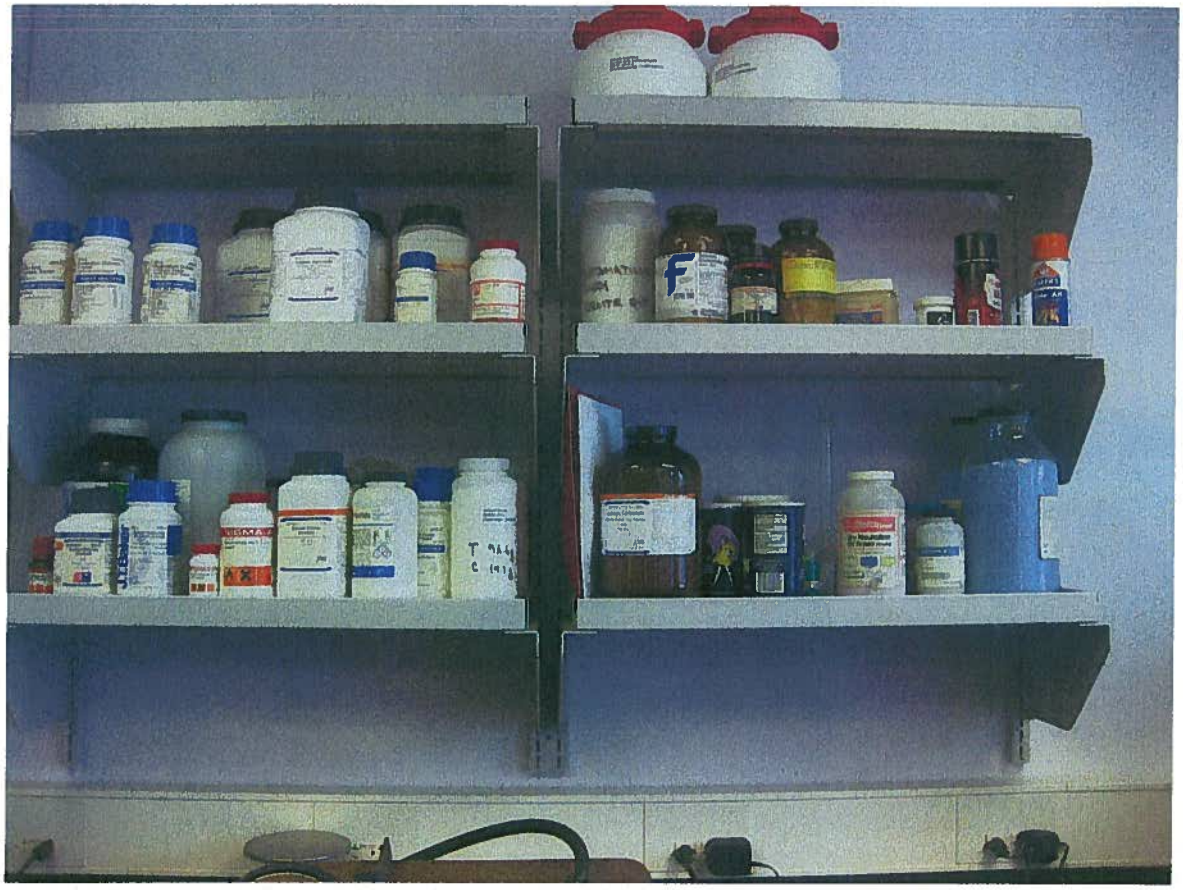

Picture 005.jpg, Tuesday, 12/21/2010, 11:47:55 AM.
Many of the chemical labels can be read when the picture is at maximum magnification. These shelves are on the south wall of the lab.

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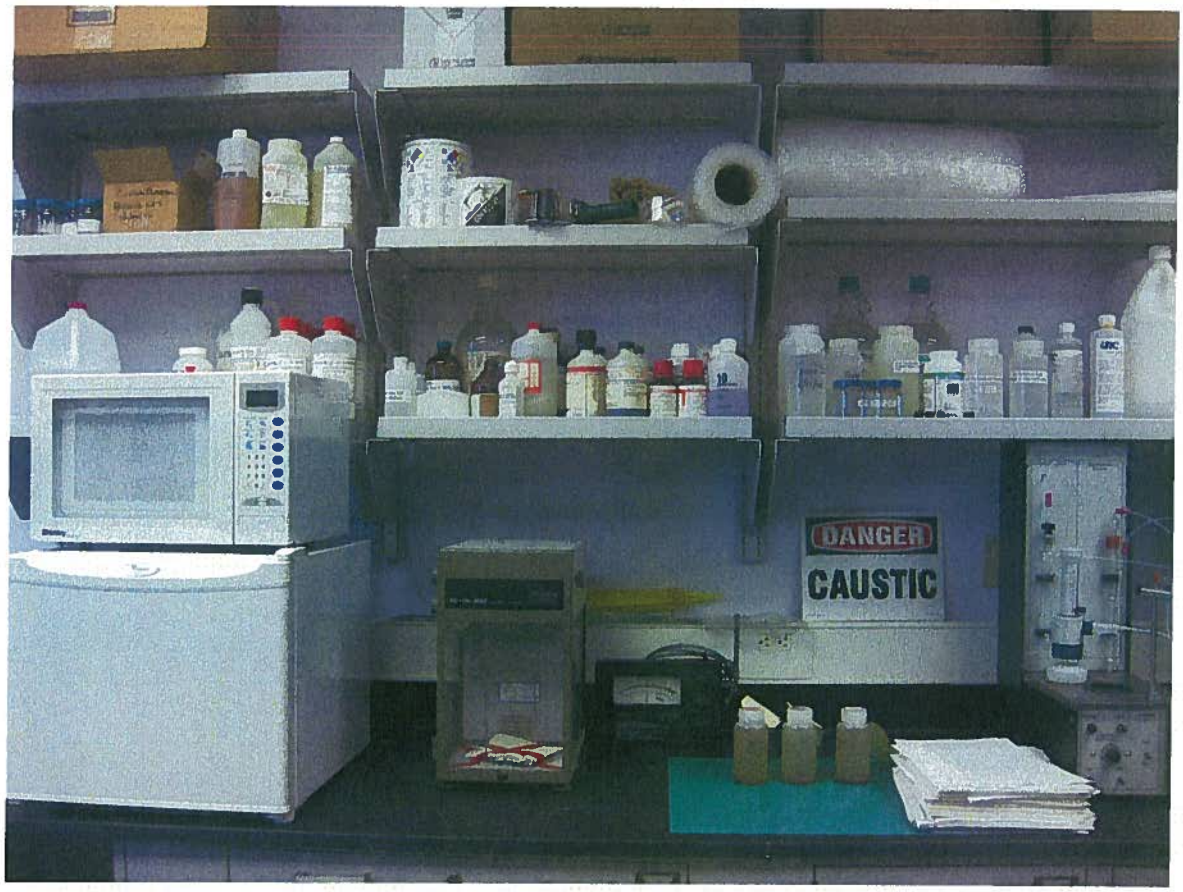

Picture 006.jpg, Tuesday, 12/21/2010, 11:50:41 AM.
Some of the container labels can be read when the picture is at maximum magnification. These walls are on the north side of the lab.

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Picture 007.jpg, Tuesday, 12/21/2010, 11:51:21 AM.
Mr. Bushnell stated that this acid has been used to clean glassware and will be reused to clean glassware. This sink is on the north wall of the lab toward the west windows and next to a door.

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Picture 008.jpg, Tuesday, 12/21/2010, 12:18:36 PM. Looking south-southeast.
The gray-looking building to the left is labeled as the EW Building on the site plan map (Picture 015.jpg). The large overhead door allows removal of granular zinc in super sacks. Rolls of scrap metal are in the middle and background. Behind the rolls, a fence separates the facility from the railroad tracks. CSX tanks cars were on the tracks during the inspection. The Grand Cal River is behind the railroad tracks.

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Picture 009.jpg, Tuesday, 12/21/2010, 12:18:43 PM. Looking south-southwest.
More rolls of scrap metal.

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Photographer: Sue Rodenbeck Brauer
Camera: Canon PowerShot SD790 IS Digital Elph

Picture 010.jpg, Tuesday, 12/21/2010, 12:18:55 PM. Looking southwest.
The concrete that is not completely covered by snow in the foreground may be the south edge of the concrete pad shown on the site plan map in Picture 015.jpg. The rail tracks are also shown on the site plan map, but the small shed is not shown. I did not examine the piles in the background between the shed and the green containers (intermodal roll off boxes?).

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Picture 011.jpg, Tuesday, 12/21/2010, 12:19:06 PM. Looking west-southwest.
Some processed scrap metal is in the foreground. Material handling equipment is visible beyond the concrete partition.

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Picture 012.jpg, Tuesday, 12/21/2010, 12:19:16 PM. Looking west-northwest.
One of CMA Reycling's shredders with part of the conveyor system.

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Camera: Canon PowerShot SD790 IS Digital Elph

Picture 013.jpg, Tuesday, 12/21/2010, 12:19:27 PM. Looking north.
More of CMA Recycling's conveying equipment. This is located east of the equipment in Picture 012.jpg. The tan Dezinc Building is visible at the right edge.

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Picture 014.jpg, Tuesday, 12/21/2010, 12:19:37 PM. Looking east.
The shredded scrap metal enters the Dezinc Building via conveyor. The gray electrowinning (EW) Building is to the right of the rail spur.

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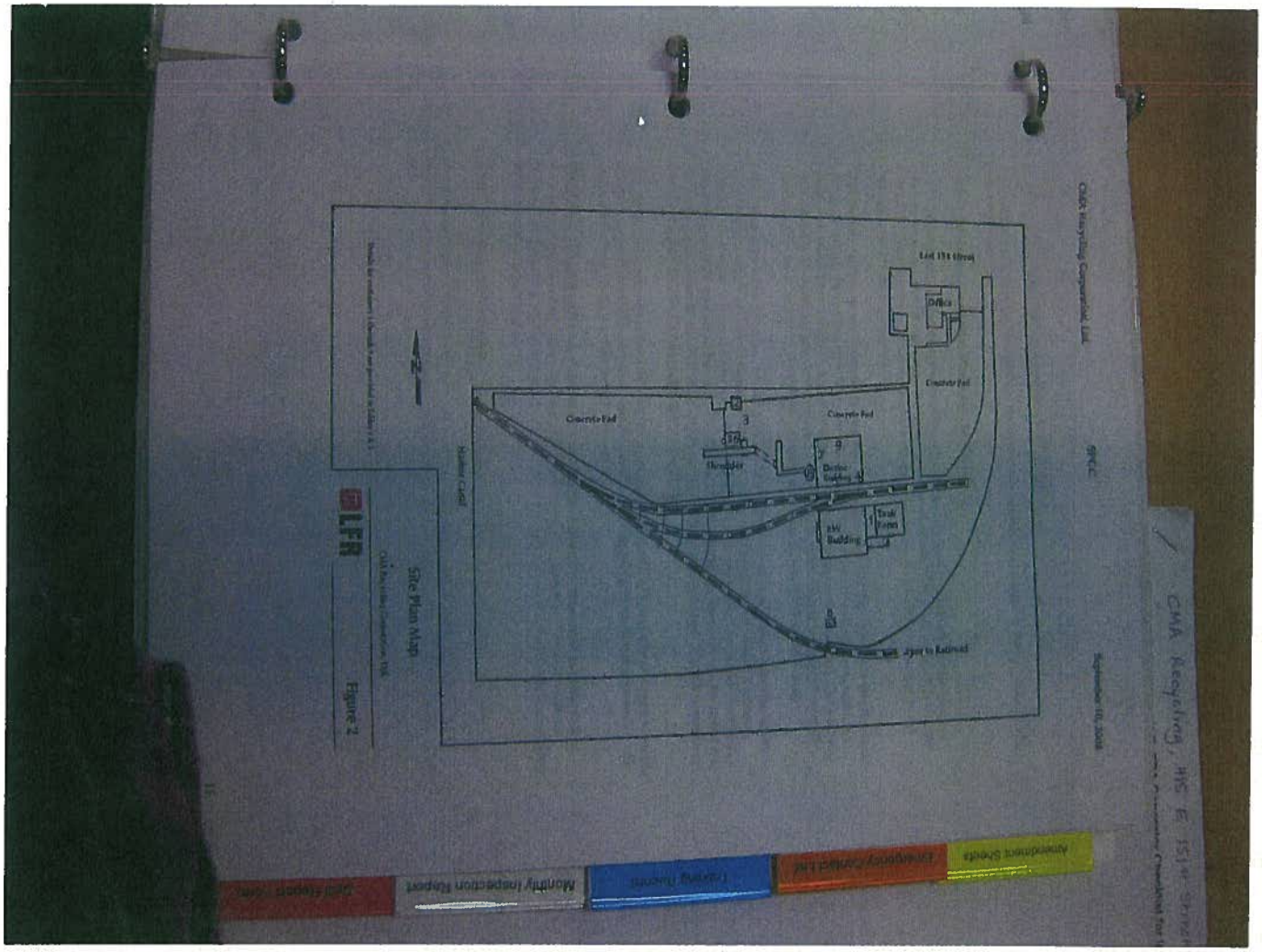
Camera: Canon PowerShot SD790 IS Digital Elph



Picture 015.jpg, Tuesday, 12/21/2010, 12:32:27 PM.
This site plan is from a non-RCRA environmental document.

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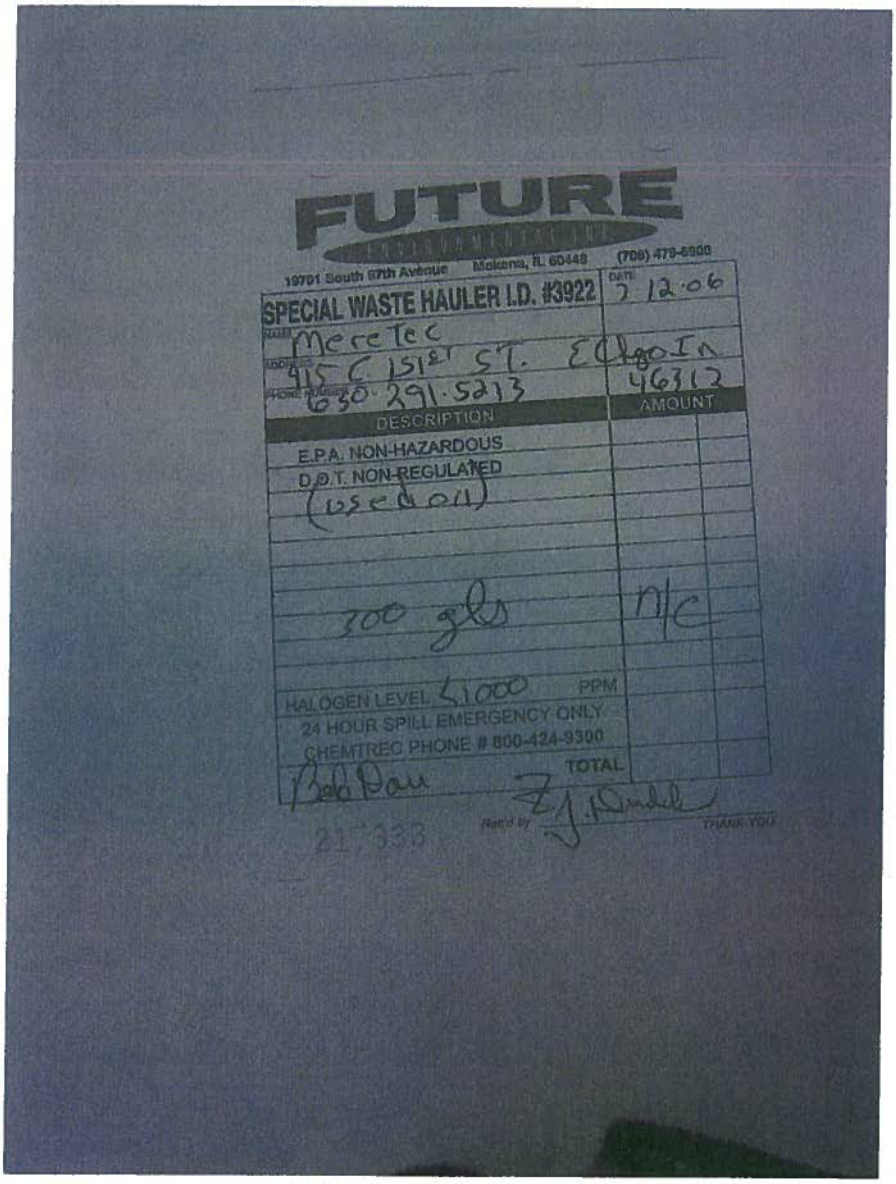
Camera: Canon PowerShot SD790 IS Digital Elph



Picture 016.jpg, Tuesday, 12/21/2010, 12:42:47 PM.
CMA Reycling provided this document as an example of nonhazardous waste transported offsite.

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Photographer: Sue Rodenbeck Brauer
Camera: Canon PowerShot SD790 IS Digital Elph

ATTACHMENT B

Checklist

CWR Recycling, 715 E 151st Street, East Chicago, IN

U.S. EPA Generator Checklist for Indiana

printed 12/17/2010 12/21/2010 inspection

PART 262: Standards Applicable to Generators of Hazardous Waste

#	40 CFR	NA = Not Applicable, NI = Not Inspected, OK = In Compliance, DF = Deficiency	NA	NI	OK	DF
		GENERAL	**NA**	**NI**	**OK**	**DF**
1	262.11	Hazardous Waste Determination (characteristic, listed, TCLP, knowledge, exclusions)		✓		
2	262.12(a)	EPA Identification Number (Generator must have ID number)			✓	
3	262.12(c)	Generator must not offer waste to transporters or facilities that have not received ID number. used oil to Future Environmental			✓	
329 IAC 3.1-7/4-6 & 8 & 11		**THE MANIFEST** stated no hazardous waste generated	**NA**	**NI**	**OK**	**DF**
4	262.20	General Requirements (manifest to approved TSD/alt. TSD, SQG reclaim exemption on file)(all required info)		✓		
5	262.21	Manifest Acquisition (generator state 1st, consignment state 2nd)		✓		
6	262.22	Number of Copies (generator, transporters, TSD, & 1 copy returned to generator)		✓		
7	262.23	Manifest Use (signature & date: generator, transporter, TSD, keep copy)		✓		
8	329 IAC 3.1-7-4	Indiana Manifest required for hazardous waste shipped to Indiana TSD Facilities	✓			
9	329 IAC 3.1-7-6	Manifest copies available for review, submitted copies within 5 days after shipping		✓		
		PRE-TRANSPORT REQUIREMENTS **NOTE:If facility treats in < 90 day tanks or containers, see 268.7**				
10	262.30, 31, 32, 33	Packaging, Labeling, Marking, Placarding (DOT regulations) (Only apply if waste is in the process of being transported)	✓			
		LARGE QUANTITY GENERATORS	**NA**	**NI**	**OK**	**DF**
11	262.34(a)	90 Day accumulation limit: Generator may accumulate on-site for 90 days or less provided that:	✓			
12	262.34(a)(1)	Waste is placed in tanks, containers, containment building, or drip pad	✓			
13	262.34(a)(2)	Container marked with start of accumulation date	✓			
14	262.34(a)(3)	Container/tank marked "Hazardous Waste"	✓			
15	262.34(b)	30 Day extension	✓			
		SATELLITE CONTAINERS	**NA**	**NI**	**OK**	**DF**
16	262.34(c)(1)	Satellite accumulation (55 gal. maximum or one (1) quart acutely hazardous)	✓			
17	262.34(c)(I)	i) Container must be closed when not in use, in good condition, and compatible with waste	✓			
18	262.34(c)(I)	ii) marked "Hazardous waste" or other words, at or near process and under control of operator	✓			

U.S. EPA Generator Checklist for Indiana

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19	262.34(c)(2)	If exceed 55 gal., container must be marked with accumulation date and must be removed within 3 days	✓			
Mr. Barker stated no hazy. waste		**SMALL QUANTITY GENERATOR** generated.	**NA**	**NI**	**OK**	**DF**
20	262.34(d)(e)(f)	SQG Requirements - 180 days or less (unless transported over 200 miles), quantity of hazardous waste on-site 6000 kg. or less, must follow:	✓			
21	262.34(d)(4)	Containers marked with start of accumulation date and words "Hazardous Waste"	✓			
22	262.34(d)(4)	Must also comply with 265 Subpart C and I. See pages 4 and 5.	✓			
23	262.34(d)(5)	i) Emergency coordinator identified	✓			
24	262.34(d)(5)	ii) Following info posted: emergency coordinator, emergency equipment location, phone numbers	✓			
25	262.34(d)(5)	iii) Employees must be familiar with handling and emergency procedures	✓			
26	262.34(d)(5)	iv) Respond to emergencies	✓			
		RECORD KEEPING	**NA**	**NI**	**OK**	**DF**
27	262.40	RECORD KEEPING (3 yrs. for copy from manifests, TSD, biennial report, exception report, test results, waste analysis/determination, extension time for unresolved enforcement.)			✓	
28	262.41	Biennial Report (due March 1 even numbered years) (**LQG ONLY**)	✓			
29	262.42	Exception Reporting (LQG: >35 days, if no return copy of manifest, contact TSD: >45 days report to IDEM, (SQG: >60 days) transportation report to IDEM)	✓			
30	262.43	Additional Reporting , if required by Commissioner (concerning quantities and disposition of wastes in 40 CFR 261)	✓			
31	262.44	SQG Recordkeeping Requirements (keep records for 3 years: manifests, exceptions, waste determination/analysis) to be requested	✓	✓	✓	
		EXPORTS	**NA**	**NI**	**OK**	**DF**
32	262.52	General Requirements (notify EPA, accepted by receiving country, EPA consent)	✓			
33	262.53	Notification of Intent to Export				
34	262.54	Special Manifest Requirements for Primary Exporters				
35	262.55	Exception Reports (>45 days from US departure, >90 days from receipt by foreign source/waste returned to US)				
36	262.56	Annual Reports (March 1 annually for waste: types, quantity, frequency, destination, waste reduction send to EPA)				
37	262.57	RECORD KEEPING (3 years for intent to export, EPA acknowledgments, confirmation of delivery, and annual reports)				
		IMPORTS OF HAZARDOUS WASTE	**NA**	**NI**	**OK**	**DF**
38	262.60	Hazardous Waste Imports (use consignment state's manifest)	✓			

U.S. EPA Generator Checklist for Indiana

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		TSD STANDARDS APPLIABLE TO GENERATORS GENERAL FACILITY STANDARDS (NA for SQG)	NA	NI	OK	DF
39	262.34 / 265.16(a)	Personnel Training (Program Adequacy)				
40	262.34 / 265.16(b)	Personnel received training within six (6) months				
41	262.34 / 265.16(c)	Personnel received annual review				
42	262.34 / 265.16(d)	Training Documents: job titles, job description, type of training, training records				
		PREPAREDNESS AND PREVENTION	**NA**	**NI**	**OK**	**DF**
43	262.34 / 265.31	Maintenance & Facility Operation(must be maintained & operated to minimize possibility of release)				
44	262.34 / 265.32	Required Equipment (a. Internal alarm/communication system b. External/telephone communication c. Fire extingishers and spill control equipment d. water/foam)				
45	262.34 / 265.33	Testing & Maintenance of Equipment				
46	262.34 / 265.34	Communication & Alarm Access				
47	262.34 / 265.35	Required Aisle Space (to allow movement of spill control and emergency equipment and inspections)				
48	262.34 / 265.37	Local Authority Arrangements (police, fire, hospital)				
		CONTINGENCY PLAN & EMERGENCY PROCEDURES (NA for SQG)	**NA**	**NI**	**OK**	**DF**
49	262.34 / 265.51	Contingency Plan for Facility				
50	262.34 / 265.52	Contingency Plan Content (SPCC plan, local arrangements, emergency coordinator, equipment list, evacuation plan, etc.)				
51	262.34 / 265.53	Contingency Plan Available (on-site, local distribution)				
52	262.34 / 265.54	Contingency Amendments (when regulations change, if plan fails, when facility makes changes)				
53	262.34 / 265.55	Emergency Coordinator available				
54	262.34 / 265.56	Emergency Procedures followed				
		USE & MANAGEMENT OF CONTAINERS	**NA**	**NI**	**OK**	**DF**
55	262.34 / 265.171	Container Condition (If not in good condition or leaking, must transfer waste or manage in some other way)				

U.S. EPA Generator Checklist for Indiana

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56	262.34 / 265.172	Waste Compatibility with Container				
57	262.34 / 265.173	Container Management (closed/manged to prevent leaks)				
58	262.34 / 265.174	Inspections (weekly)				
59	262.34 / 265.176	Ignitable/Reactive Waste (50 ft. set back)				
60	262.34 / 265.177	Special Requirements for Incompatible Waste (physical separation/container compatibility)				
		LAND DISPOSAL RESTRICTIONS	**NA**	**NI**	**OK**	**DF**
61	268.3	Dilution prohibited as substitute for adequate treatment				
62	268.7	Waste Analysis, Recordkeeping (LDR Notifications: waste code, whether it is a wastewater or non-wastewater, waste constituents to be monitored if monitoring will not include all regulated constituents, subcategory if applicable, and manifest number.)				
63	268.7 (a)(4)	Treatment in 90-day tanks/containers requires waste analysis plan and testing frequency, filed with Regional Administrator (IDEM), certification of shipment, retained copies on-site (5 yrs.), notifications include: EPA ID #, treatment standards with 5 letter code, and manifest number				
64	268.7(a)(7)	Notifications must be kept on-site for five (5) years				
65	268.9	Listed and characteristic waste codes assigned for listed waste exhibiting characteristic				
66	268.42	Alternative treatment specified for lab packs, mixed waste: most stringent standards				
67	268.45	Treatment standards for hazardous debris				
		OTHER	**NA**	**NI**	**OK**	**DF**
68	IC 13-30	Release of contaminants to environment (snow cover, no stains observed)			✓	
69	IAC 3.1-7-8	Facility has waste minimization program as certified on manifest	/			
70	IC 13-30-2-1 (9)	Does facility have any processes or activities (e.g. waste piles, incinerators, land disposal) which require a permit or interim status? If so, please identify below:				

~~It is possible~~ It appears that the de-zincing and electrowinning processes were closed loop recycling with minimal solid wastes generated. No wastewater is discharged (to be confirmed)

The completed checklist represents the inspector's understanding during the inspection and may change with review of documents to be requested.